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Dec 31 2024

CLERK U.S. DISTRICT COURT
DISTRICT OF ARIZONA

GARY M. RESTAINO
United States Attorney
District of Arizona
ALEXANDRIA SAQUELLA
Assistant U.S. Attorney
United States Courthouse
405 West Congress, Suite 4800
Tucson, Arizona 85701-5040
Telephone: (520) 620-7300
E-mail: alexandria.saquella@usdoj.gov
Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Sterling Lee Runyon,

Defendant.

CR 24-9257-TUC-AMM-EJM
Mag. No. 24-05369M (EJM)

STIPULATION AND JOINT MOTION
FOR RELEASE OF MATERIAL
WITNESSES WITHOUT TAKING
VIDEO DEPOSITION

The United States of America, through undersigned counsel, and the defendant, individually and through counsel, do hereby agree and stipulate as follows:

1. Jovani Alejandro Gonzalez-Mejia and Lizbeth Jimenez-Hernandez (hereinafter referred to as "material witnesses"), are not natural born or naturalized citizens, legal permanent residents, or nationals of the United States;

2. The material witnesses entered the United States illegally on or about December 7, 2024;

3. The material witnesses were transported in the vehicle where defendant Sterling Lee Runyon was the driver;

4. The parties also jointly agree that as a result of this stipulation, the material witnesses will be returned to their country of origin and thus unavailable as defined in Fed. R. Evid. 804;

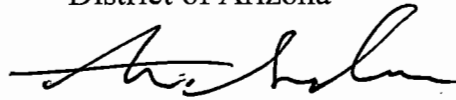
5. Therefore, the parties agree that the government may elicit hearsay testimony from any agent regarding any statements made by the above-referenced material witnesses

1 contained in the disclosure, and such testimony shall be admitted as substantive evidence
2 in any hearing or trial in the above captioned matter.

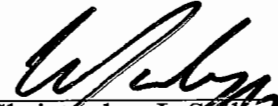
3 Based on the foregoing, the parties jointly move for the release of the above-named
4 material witnesses to the Department of Homeland Security for return to their country of
5 origin.

6 Respectfully submitted this 31 day of December, 2024.

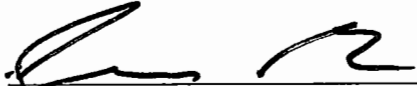
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8 GARY M. RESTAINO
United States Attorney
District of Arizona

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10 
11 ALEXANDRIA SAQUELLA
Assistant U.S. Attorney

12
13 I translated or caused to be translated this agreement from English into Spanish to
14 the defendant on the ___ day of ___, 2024.

15
16 
17 Christopher L. Scileppi, Esq.
Attorney for Defendant

18
19 I understand and agree to the terms of this stipulation.

20
21 
22 Sterling Lee Runyon
Defendant